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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRENDA CARMONA-VENEGAS,

Defendant.

CASE NO. 1:20-CR-00044-DAD

STIPULATION TO CONTINUE SENTENCING
DATE; ORDER

DATE: Pursuant to the stipulation of the parties,
March 8, 2022
TIME: 9:00 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on Pursuant to the stipulation of the parties, March 8, 2022.
2. By this stipulation, defendant now moves to continue the sentencing until August 15, 2022. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for defendant desires additional time to work with defendant in obtaining records and other items in preparation for sentencing.
 - b) Counsel for defendant has also been diligently seeking this information, but defendant now works nights, and given the difficulty in scheduling meetings with defendant in

light of her schedule, obtaining the information is taking longer than anticipated and is more challenging than anticipated. Additionally, counsel for defendant is currently preparing for a jury trial in a different matter and desires additional time.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: February 23, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ LAURA JEAN BERGER
LAURA JEAN BERGER
Assistant United States Attorney

Dated: February 23, 2022

/s/ JAYA GUPTA
JAYA GUPTA
Counsel for Defendant
BRENDA CARMONA-
VENEGAS

ORDER

Pursuant to the stipulation of the parties, the sentencing hearing previously scheduled for March 8, 2022 is hereby continued to August 15, 2022 at 8:30 a.m.

IT IS SO ORDERED.

Dated: February 23, 2022

Dale A. Ingh
UNITED STATES DISTRICT JUDGE